

created from transmitted cell identifiers. Applicants find support for this amendment in the original Specification at 2/26-27 "a paging is carried out to the last-used radio cell or cells...", at 5/15 – 6/3, and at 9/5-16.

5                   **35 U.S.C. §103 Claims 1 and 10 in view of Kauppi and Boudreau**

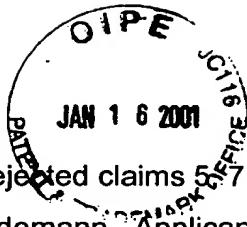
**Present invention's list construction**—The present invention, with claims 1 and 10 amended as above, require a list of cell identifiers that are constructed in a specific manner, i.e., that a transmitted cell identifier is entered into the list, and that this transmitted cell identifier as well as all of those cell identifiers previously  
10   transmitted, become the list of retained cell identifiers. This list of cell identifiers is then used to transmit the paging broadcast. A teaching of such a construction is not found in Boudreau.

**Boudreau's list construction**--Boudreau simply records the cell identifier for statistical purposes (9/4-11 & 9/35-38). Boudreau then generates a plurality of  
15   location areas based on a statistical analysis and derives the list from specified paging area parameters (9/24-26) based on a statistical likelihood of the mobile station being found (10/1-9 & 10/30-34). This statistical information takes into account factors such as idiosyncracics of the geographic terrain and obstructions of a system (10/20-25). We note that there are many different ways such a statistical-  
20   based list could be constructed, including the above mentioned utilization of terrain factors, distances relating to a home base area or a last used area, some form of a most historical likely location, etc. Boudreau is silent on the mechanisms of its list construction.

          To summarize, Boudreau in no way discloses utilizing the list of retained cell  
25   identifiers as does the present invention, but rather utilizes a list based on a statistical formula based on parameters.

          Kauppi lacks any discussion of a list being retained based on transmitted cell identifiers that are utilized to broadcast a paging message.

          Thus, Applicant believes that independent claims 1 and 10, and thus, all  
30   remaining claims that depend from them are not obvious in light of the combination of Kauppi and Boudreau.




The Examiner has rejected claims 5, 7, and 8 in view of the combination of Boudreau, Kauppi, and Tiedemann. Applicants rely on the above arguments and respectfully assert that Tiedemann does not add any disclosure related to the list construction and subsequent transmission of the paging broadcast to areas  
5 identified in the list—Tiedemann was cited by the Examiner as relating only to storing a time of last registration.

Applicants believe that the present amendment to the claims distinguishes the present invention from the disclosures of the art cited above and respectfully ask that the Examiner withdraw the 35 U.S.C. §103 rejection from the present  
10 application.

**Conclusion**

Inasmuch as each of the rejections have been overcome by amendments to the specification and the claims, and by the applicants' arguments indicating clear  
15 distinctions between the present invention and the art cited against it, it is respectfully requested that the present application be reconsidered, the rejections be withdrawn and that this application be passed to issue.

Respectfully submitted,

 (Reg. No. 45,877)

Mark Bergner  
Schiff Hardin & Waite  
7100 Sears Tower  
233 South Wacker Drive  
Chicago, Illinois 60606-6473  
(312) 258-5779  
Attorneys for Applicant

**Certificate of Mailing**

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D C 20231 on January 12, 2001

  
Attorney for Applicants